



LEOPOLD GROSS, PLLC
ATTORNEYS AT LAW

26 Court Street, Suite 1200
Brooklyn, New York 11242
Tel: (212) 943-4300
Fax: (646) 943-8151

November 27, 2017

Via ECF:

Honorable Sterling Johnson, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *U.S. v. Lebovits, et. al.*,
Case No. 11-cr-00134 (SJ)

Dear Judge Johnson:

This office represents Moses Neuman in the above-referenced matter. This correspondence is respectfully submitted to request that the conditions of Mr. Neuman's release be modified to permit travel to the below listed trade show for business purposes.

In April 2013, Mr. Neuman pled guilty. (Dkt. No. 153). He has completed his incarceration sentence of twelve months and one day, and currently has less than five months remaining on his three-year supervised release. Under the conditions of his release, his travel is limited to the Eastern District of New York. (Dkt. No. 217 at 3). He has been in full compliance with the conditions of release.

In the past, Mr. Neuman's probation officer and this Court permitted him to travel to domestic and international trade shows.

Mr. Neuman is in the medical supply business. During the past two years, Mr. Neuman was involved in the development of approximately 70 medical and educational products. Mr. Neuman desires now to travel to the below listed trade show to exhibit his newly created products and by the same token be informed of other new products being developed in the industry. His attendance at the below listed trade show is critical for him meet new clients, keep his products up to date, keep his products in accordance with industry standards and be informed of the market's demands.

Hon. Sterling Johnson, Jr.
November 27, 2017
Page 2

Mr. Neuman seeks permission to travel to the following destination on the following date:

Name of Show	Event	Starts	Ends	City, State	Country
HKTDC Hong Kong Toys & Games Fair	Trade Show	January 3, 2018	January 15, 2018	Wan Chai	Hong Kong

Alternatively, if this Court does not wish to be burdened with Mr. Neuman's travel requests, we respectfully submit that the Court grant the Probation Department authority to grant or deny Mr. Neuman's requests to travel.

On November 27, 2017, I conferred with Probation Officer Vincent Daniello (631-712-6321) and Assistant U.S. Attorney Tanisha Payne and both advised that they do not object to the foregoing request.

Respectfully submitted,


Leopold Gross

cc: Tanisha Payne, Esq., U.S. Attorney's Office (via ECF)
Vincent Daniello, Probation Officer (via email)